



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

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Gray Davis  
Governor

July 12, 2000

Mr. Joseph P. Kwan  
TRW Inc.  
1900 Richmond Road  
Cleveland, OH 44124

**SAN GABRIEL VALLEY CLEANUP PROGRAM – THE MONADNOCK COMPANY  
SITE LOCATED AT 18301 ARENTH AVENUE, CITY OF INDUSTRY (FILE NO.  
105.0181)**

Dear Mr. Kwan:

This is in reference to a report titled "Request for Onsite Groundwater Closure" for the subject site dated September 3, 1999, and two groundwater monitoring reports dated December 1999 and April 2000, and a subsequent teleconference on June 28, 2000 between Regional Board staff and TRW representatives.

A groundwater treatment system using well MW-2 was operational at the site from November 1995 through June 1998. The system used carbon adsorption to remove volatile organic compounds (VOCs) and an ion exchange unit to remove chromium from the extracted groundwater. Treated groundwater was discharged to a nearby storm drain under an NPDES permit. A total of 2.3 pounds of VOCs were removed from the contaminated groundwater since system startup in 1995.

TRW Inc. (TRW) requested on-site groundwater system closure in September 1999 because VOC concentrations beneath the site appeared to have reached stable concentrations, independent of the operation of the system. Regional Board staff concurred with this conclusion, in a letter dated October 22, 1999, but requested that additional data be collected to determine if stabilization and declining VOC levels would continue without active treatment and if emergent chemicals were a threat to groundwater quality at the site.

TRW conducted the requested additional quarterly monitoring in November 1999 and February 2000, and submitted groundwater monitoring reports dated December 1999 and April 2000. The results of these sampling events documented that VOC concentrations continued to remain stable, near the lowest levels historically recorded, in the absence of active treatment. However, 1,4-dioxane was detected in groundwater at concentrations up to 49 ug/L. Because this

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compound has not been previously analyzed at the site, data regarding its historical concentrations are not available. Therefore, TRW is directed to continue groundwater monitoring for one year to determine the trend in 1,4-dioxane concentrations.

As agreed upon during our teleconference on June 28, 2000, TRW shall continue to monitor groundwater until August 2001, under the following schedule: 1) all wells except MW-1 (which was damaged) shall be sampled semi-annually (August 2000 and February 2001) and analyzed for VOCs, chromium, and cyanide, 2) wells MW-2 and MW-12 shall be additionally sampled on a quarterly schedule (August 2000, November 2000, February 2001, and May 2001) and analyzed for 1,4-dioxane, and 3) all wells except MW-1 shall be sampled in August 2001 and analyzed for VOCs, chromium, cyanide, and 1,4-dioxane. The results of these analyses are to be presented in three semi-annual reports due October 15, 2000, April 15, 2001, and October 15, 2001. TRW's request for on-site groundwater closure shall be reconsidered at the completion of this program.

Thus, your first groundwater monitoring report is due by October 15, 2000. If you have any questions concerning this matter, please call me at (213) 576-6727.

Sincerely,



E. G. Solomon  
Associate Engineering Geologist

cc ✓ Ms. Penny McDaniel, USEPA, Region IX  
Ms. Linda A. Niemeyer, Orion Environmental Inc.